

EXHIBIT B

From: Jerrold Bregman <jbregman@bg.law>
Sent: Thursday, September 24, 2020 3:30 PM
To: Kevin Coleman
Subject: RE: Proof of Claim 18-12456-gs

Thanks Kevin. We are talking with Jeff tomorrow am about other matters and will try to get a response then. Will keep you posted. - Jerry

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From: Kevin Coleman [mailto:kcoleman@nutihart.com]
Sent: Thursday, September 24, 2020 3:18 PM
To: Jerrold Bregman <jbregman@bg.law>
Subject: FW: Proof of Claim 18-12456-gs

CAUTION: This email originated from an external source.

Hi Jerry,

Thank you for filing the proofs of claim. Before I take any substantive action with respect to them, I want to ask if your client will agree not to assert and/or waive any conflict of interest associated with objecting to the claims.

As you know, there is authority holding that counsel to a trustee represents the estate. To the extent that applies, I do not want to have a side-show over whether any actions taken with respect to objecting to the claims constitutes a breach of duty owed to a former client (specifically, breach of the duty of loyalty or use of confidential information obtained in a prior representation). If an objection is sustained, that obviously will impact the assets in the Desert Land estate. I do think the claims are baseless, and if your client grants the waiver I will be preparing an objection.

Can you please let me know if Jeff is prepared to waive this arguable conflict? If so, I will prepare a short stipulation and order for submission to the court. If not, we will arrange for counsel for the Gonzales Trust or special counsel to handle the objection. Either way, please let me know as soon as possible what decision he makes.

Best regards,

--Kevin

From: USBC_NEVADA@nvb.uscourts.gov [mailto:USBC_NEVADA@nvb.uscourts.gov]

Sent: Wednesday, September 23, 2020 4:03 PM

To: Courtmail@nvb.uscourts.gov

Subject: Proof of Claim 18-12456-gs

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U.S. Bankruptcy Court

District of Nevada

Notice of Electronic Claims Filing

The following transaction was received from GUBNER, STEVEN on 9/23/2020 at 4:02 PM PDT

Case Name:	DESERT OASIS APARTMENTS, LLC
Case Number:	18-12456-gs
	Desert Land, LLC
Creditor Name:	c/o Jeffrey I. Golden, Trustee
	650 Town Center Dr., Suite 600
	Costa Mesa, CA 92626
Claim Number:	3 Claims Register
Amount Claimed:	\$78,000,000.00
Amount Secured:	
Amount Priority:	

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:9-23-20 Apartments Claim v2.pdf

Electronic document Stamp:

[STAMP bkecfStamp_ID=989277954 [Date=9/23/2020] [FileNumber=33243432-0]
] [c5321da9a6b2bf70ec52627cbf3c8d2bdc6c3e50dafa2f92aa3b8d50de31eb4e316
3cdd570c9b6154d8f309baeb2bfacdee9363ccd1d76c5cf4d0d2decc5189e]]

18-12456-gs Notice will be electronically mailed to:

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